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Attorneys for Plaintiffs AXTS Inc and
Rainier Arms, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

(Eugene Division)

AXTS INC, an Oregon corporation; and
RAINIER ARMS, LLC, a Washington limited
liability company,

Civil No. 6:13-cv-02100-AA

Plaintiffs,

v.

**STIPULATED PERMANENT
INJUNCTION**

ARMS UNLIMITED INC., a California
corporation; **DANIEL SHAMIE**, an individual; and
JOSH SALAMA, an individual,

Defendants.

Plaintiffs AXTS Inc and Rainier Arms, LLC ("Plaintiffs") and defendants Arms
Unlimited Inc., Daniel Shamie, and Josh Salama ("Defendants") hereby stipulate to a permanent

injunction enjoining Defendants, including all partners, officers, agents, employees, and all other persons or entities in active concert or participation with them from:

- a. manufacturing, purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles that bear the AXTS, RAINIER ARMS or RAPTOR marks that are not manufactured by AXTS Inc;
- b. purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles that bear the AXTS, RAINIER ARMS or RAPTOR marks that are manufactured by AXTS Inc;
- c. using Plaintiffs' RAINIER ARMS, RAPTOR or AXTS marks or any other confusingly similar mark, whether alone or in connection with other words or symbols;
- d. purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles manufactured by AXTS Inc that bear trademarks or brands other than the RAINIER ARMS or RAPTOR marks, including those sold by:
 - i. Arsenal Democracy – 48 Commerce Lane, Freeport, FL;
 - ii. Noveske Rifleworks – 594 N.E. E St. Rear, Grants Pass, OR;
 - iii. Head Down Products – 268 Cadillac Parkway (Suite 108), Dallas, GA;
 - iv. SWFA.com – 420 Century Way #100, Red Oak, TX;
 - v. Legion Firearms – 1901 Ramcon Dr., Temple, TX; and
 - vi. Warsport – 135 Forest Hills Place, Robbins, NC;
- e. Manufacturing, purchasing or otherwise acquiring, or selling, transferring or otherwise disposing of charging handles that infringe U.S. Patent No. D694,354.

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This injunction will remain in effect permanently.

DATED: 6/17, 2014.



DISTRICT COURT JUDGE

STIPULATED BY

AXTS, INC

By: Joshua Uholm
Its: President
Date: 04/23/14

RAINIER ARMS, LLC

By: _____
Its: _____
Date: _____

ARMS UNLIMITED INC.

By: _____
Its: _____
Date: _____

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This injunction will remain in effect permanently.

DATED: _____, 2014.

DISTRICT COURT JUDGE

STIPULATED BY

AXTS, INC

By: _____
Its: _____
Date: _____

RAINIER ARMS, LLC

By: John Huang _____
Its: CEO _____
Date: 04-21-2014 _____

ARMS UNLIMITED INC.

By: _____
Its: _____
Date: _____

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This injunction will remain in effect permanently.

DATED: _____, 2014.

DISTRICT COURT JUDGE

STIPULATED BY

AXTS, INC

By: _____
Its: _____
Date: _____

RAINIER ARMS, LLC

By: _____
Its: _____
Date: _____

ARMS UNLIMITED INC.

By: Daniel Shemir
Its: President
Date: 4/4/14

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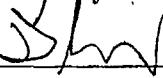
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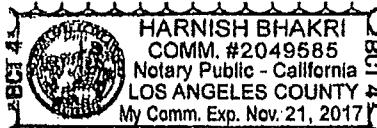
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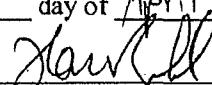
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DANIEL SHAMIE,
individually



SUBSCRIBED AND SWORN to before me this 4th day of April, 20114.




Notary Public for California
My Commission Expires: Nov 21 2017

JOSH SALAMA,
individually

SUBSCRIBED AND SWORN to before me this _____ day of _____, 201 ____.

Notary Public for California
My Commission Expires: _____

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DANIEL SHAMIE,
individually

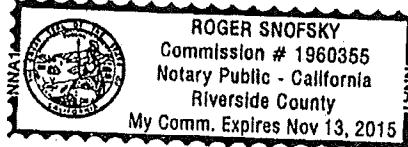
SUBSCRIBED AND SWORN to before me this _____ day of _____, 201____.

Notary Public for California
My Commission Expires: _____

JOSH SALAMA,
individually

SUBSCRIBED AND SWORN to before me this 2nd day of April, 20114.

Roger Snofsky
Notary Public for California
My Commission Expires: 11/13/2015



037094/00001/5111214v1